

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Edson Flores-Martinez

PRINCIPAL

YOB: 1993

United States Courts  
Southern District of Texas

Mexico FILED

November 03, 2021

Nathan Ochsner, Clerk of Court

## CRIMINAL COMPLAINT

Case Number:

M-21- 2321 -M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 1, 2021 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Mariela Patricia Acevedo-Maldonado and Elba Antunez-Ortega, citizens and nationals of Honduras, along with five (5) other undocumented aliens, for a total of seven (7), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near McAllen, Texas to the point of arrest near McAllen, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On November 1, 2021, at approximately 2:40pm, McAllen Border Patrol Station (MCS) received notice of a drone hovering south of the border wall near an orchard in McAllen, Texas. MCS camera operators began scanning the area and observed a black Ford F-150 travelling south of the border wall toward an orchard. Within a few minutes, the camera operators observed the F-150 drive back north. This activity was deemed suspicious and relayed to Agents in the field. In the days prior, MCS had seen an increase in drones being used for human smuggling activities, and had apprehended subjects in a smuggling event within the same vicinity that involved drone scouting and similar circumstances.

Within minutes, an Agent responded to the area and identified a black pickup truck which had been the only mobile vehicle in the area. The Agent immediately activated her emergency lights. As the vehicle passed her by, she was able to observe a male driver, but no other occupants. The Agent proceeded to pull behind the vehicle to conduct an immigration inspection, but the driver failed to yield. The driver did not yield until the Agent activated the emergency sirens, pulled next the driver while mobile, and verbalized for him to stop.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Complaint authorized by AUSA D. Chung

Submitted by reliable electronic means, sworn to and attested telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

/s/ Shakira Singho

Signature of Complainant

Shakira Singho

Border Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

November 3, 2021 -10:56 a.m.  
Date

at McAllen, Texas  
City and State

Juan F. Alanis, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-21- 2321 -M**

**RE: Edson Flores-Martinez**

Once the Agent approached the driver, she quickly observed the front passenger sitting on the floorboard. She also observed subjects in the rear cab of the vehicle. The driver was identified as Edson Flores-Martinez, a citizen and national of Mexico illegally present in the United States (US). The seven (7) passengers also admitted to being illegally present in the US. All subjects were arrested and transported to the McAllen Border Patrol Station for processing.

**PRINCIPAL STATEMENT:**

Edson Flores-Martinez, a citizen of Mexico, was read his Miranda rights, stated he understood his rights, and agreed to provide a sworn statement.

Flores indicated that the person who he paid for his smuggling arrangements offered him to work in exchange to pay his way to Houston, Texas. He stated his smuggling fee to Houston was \$6,000. Flores said he was instructed to drive a black Ford F-150 to a location and would be given step-by-step instructions via phone. Once instructed to stop at the location, Flores admitted that a group of people ran out of the brush and into his vehicle. Shortly after, he said a Border Patrol Agent drove behind his vehicle with emergency lights, but he did not stop until he heard the emergency siren.

**MATERIAL WITNESS STATEMENT 1:**

Mariela Patricia Acevedo-Maldonado, a citizen of Honduras, was read her Miranda rights, stated she understood her rights, and agreed to provide a sworn statement.

Acevedo stated she was charged \$10,000 dollars to be smuggled to Louisiana. She admitted to wading across the Rio Grande River with a group and brush guide. She said she was led to a location and entered the front passenger's seat of a black pickup truck. Once in the truck, she says that the driver said, in Spanish, "Accommodate yourselves". Acevedo said approximately two minutes later they were stopped by Border Patrol.

Acevedo was shown a photo lineup and was able to identify Edson Flores-Martinez as the driver of the black pickup truck.

**MATERIAL WITNESS STATEMENT 2:**

Elba Yolanda Antunez-Ortega, a citizen of Honduras, was read her Miranda rights, stated she understood her rights, and agreed to provide a sworn statement.

Antunez stated she was unaware of the amount her sister and partner paid for her to be smuggled to Louisiana. She admitted to wading across the Rio Grande River with a group and brush guide. Antunez said she was led to an orchard area and entered the rear cab of a black pickup truck. Once in the truck, she said the driver said, in Spanish, "Do not look up, it has nothing to do with it."

Antunez stated she was unable to identify the driver in a photo line-up because she was facing down in the rear seat and had people on top of her.